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6 Attorneys for Plaintiff
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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF ORANGE

12 RAYMOND STODDARD and)
SANTIAGO MEDINA etc.,)
13)
14 Plaintiffs,)
15 vs.)
16 EQUILON ENTERPRISES, LLC, et)
al.,)
17 Defendants.)

Case No. 30-2010-00395208-CU-0E-CXC
Hon. James J. Di Cesare
Department C 16
CLASS ACTION
NOTICE OF MOTION AND
MOTION FOR AN AWARD OF
ATTORNEYS' FEES, COSTS AND
EXPENSES AND A SERVICE
AWARD TO THE CLASS
REPRESENTATIVE
[Filed Concurrently with
Memorandum of Points and
Authorities and Supporting
Declaration]
Date: July 16, 2021
Time: 9:30 a.m.
Dept: C 16
Complaint Filed: August 2, 2010
Trial Date: None Set

1 **TO THIS HONORABLE COURT:**

2 **PLEASE TAKE NOTICE** that on July 16, 2021, at 10:30 am., or as soon
3 thereafter as counsel may be heard, in Department C 16 of the above-entitled
4 Court, BLEAU FOX, a Professional Law Corporation (“Bleau Fox”) and Plaintiff
5 and Settlement Class Representative SANTIAGO MEDINA (“Medina”) will and
6 do hereby move jointly for the following:

7 A. For a Class Counsel Award to Bleau Fox of Attorneys’ Fees in the
8 sum of Two Hundred Eighty-One Thousand Six Hundred Sixty-Seven Dollars
9 (\$281,667.00);

10 B. For a Class Counsel Award to Bleau Fox of its costs and expenses in
11 the sum of Eleven Thousand Three Hundred Sixty-Seven Dollars and Twenty-
12 Four Cents (\$11,367.24); and

13 C. For a Service Award to Medina in the sum of Five Thousand Dollars
14 (\$5,000.00).

15 This motion is noticed in accordance with this Court’s Revised Second
16 Amended Preliminary Approval Order filed on April 12, 2021, and complies with
17 the terms of the Third Amended and Restated Settlement Agreement between
18 Medina and Defendant R&M Pacific Rim, Inc. (“R&M) preliminarily approved by
19 that order.

20 This motion is based upon this notice, the concurrently filed Memorandum
21 of Points and Authorities, Declaration of Samuel T. Rees, the pleadings, papers
22 and records filed in this action, such supplemental briefs and declarations which
23 may be filed and such argument and evidence as may be presented.

24 Dated: June 1, 2021

BLEAU FOX
A Professional Law Corporation

26 By: /s/ Samuel T. Rees

27 Samuel T. Rees

Attorneys for Plaintiff and Plaintiff Class

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PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 580 West Empire Avenue, Burbank, California 91504.

On June 1, 2021, I served the foregoing document(s) described as **NOTICE OF MOTION AND MOTION FOR AN AWARD OF ATTORNEYS' FEES, COSTS AND EXPENSES AND A SERVICE AWARD TO THE CLASS REPRESENTATIVE** on the interested parties to this action who are listed on the attached Service List by electronically serving those persons at the electronic addresses noted therein.

STATE: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

FEDERAL: I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct of my own personal knowledge, and that I am employed in the office of a member of the Bar of this Court at whose discretion this service was made.

Executed on June 1, 2021, at Burbank, California.

/s/ Nathan Childress

Nathan Childress

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SERVICE LIST

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